



03-OSR-0028

U.S. Department of Energy
Office of River Protection
Mr. R. J. Schepens
Manager
P.O. Box 450, MSIN H6-60
Richland, Washington 99352

CCN: 052716

MAR 07 2003

Dear Mr. Schepens:

**CONTRACT NO. DE-AC27-01RV14136 – BECHTEL NATIONAL, INC. RESPONSE TO
INSPECTION REPORT A-03-OSR-RPPWTP-005 - DOCUMENT CONTROL AND
RECORDS MANAGEMENT**

Reference: CCN 051359, Letter, R. J. Schepens, ORP, to R. F. Naventi, BNI, "Inspection
Report A-03-OSR-RPPWTP-005 - Document Control and Records
Management," 03-OSR-0030, dated February 7, 2003.

The purpose of this letter is to provide Bechtel National, Inc.'s (BNI) response to the finding
contained in Inspection Report A-03-OSR-RPPWTP-005.

From January 6 through January 16, 2003, the U.S. Department of Energy, Safety Regulation
Division conducted an inspection of the BNI document control and records management
performance associated with the design and construction of the Hanford Waste Treatment and
Immobilization Plant. This inspection identified one finding: A-03-OSR-RPPWTP-005-F02.
BNI's response to the finding can be found in the attachment to this letter.

If you have any questions or if we can be of further assistance, please call Mr. Bill Spezialetti at
371-3074.

Very truly yours,

R. F. Naventi
Project Director

DF/slr

Attachment: Response to Finding A-03-OSR-RPPWTP-005-F02

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**RESPONSE TO FINDING
A-03-OSR-RPPWTP-005-F02**

Summary of Finding

During the performance of document control and records management inspection the following item was identified:

Quality Assurance Manual Policy Q-05.1, Instructions, Procedures, and Drawings, Section 3.1.1 requires "Activities affecting quality shall be prescribed by and performed in accordance with documented instructions, procedures, and drawings of the type appropriate to the circumstances...." Procedure 24590-WTP-3DP-G04B-00046, Engineering Drawings, Revision 3, Section 3.5.3, requires in part

All outstanding design change control documents (DCNs, Field Change Requests, Field Change Notices) and other approved design changes approved for incorporation (SDDRs, NCRs) shall be incorporated into the associated drawings, by drawing revision, anytime one of the following occurs:

- The drawing is revised and reissued for any reason...

Field Change Request (FCR) 24590-WTP-FCR-C-02-046 was approved on June 14, 2002, for incorporation into drawing 24590-HLW-DD-S13T-00008, "HLW Vitrification Building Concrete Embed and Anchorage Schedule and Details," Revision 1, to add a note to the drawing stating "Lateral alignment for embed plates in each direction in the plane of the slab, column, or wall shall be +/-2." Revisions 2, 3, 4, and 5 of drawing 24590-HLW-DD-S13T-00008 were subsequently issued since June 14, 2002.

Contrary to QAM Policy Q-05.1 and procedure 24590-WTP-3DP-G04B-00046, as of January 16, 2003, FCR 24590-WTP-FCR-C-02-046 had not been incorporated into the four revisions of drawing 24590-HLW-DD-S13T-00008.

Failure to incorporate FCR 24590-WTP-FCR-C-02-046 into drawing 24590-HLW-DD-S13T-00008 is a finding against QAM Policy Q-05.1 regarding the requirement to follow procedures, specifically procedure 24590-WTP-3DP-G04B-00046.

1) BNI Response

BNI agrees with finding A-03-OSR-RPPWTP-005-F02.

2) Reason for the Finding

The following chronology of events associated with 24590-WTP-FCR-C-02-046 has been determined and investigated by E&NS:

- 07/15/02 – Rev. 2 of 24590-HLW-DD-S13T-00008 was issued without the FCR being incorporated.
- 09/01/02 – ALTRIS database shows the FCR being linked to Rev. 2 of drawing 24590-HLW-DD-S13T-000008.
- 9/19/02 – Rev. 3 of 24590-HLW-DD-S13T-00008 was issued without the FCR being incorporated.
- 11/12/02 – Rev. 4 of 24590-HLW-DD-S13T-00008 was issued without the FCR being incorporated.
- 01/01/03 - ALTRIS data migrated to the new system CONRAD. CONRAD contains a new data element that tracks "Initial Links" and at this time link 24590-WTP-FCR-C-02-046 to Rev. 4 of 24590-HLW-DD-S13T-00008.
- 01/10/03 – Rev. 5 of 24590-HLW-DD-S13T-00008 was issued without the FCR being incorporated.

It appears that engineering failed to notice the linked FCR and thus failed to incorporate the FCR on four separate occasions. No reason for these oversights has been determined beyond human error.

3) Corrective steps that have been taken and the results achieved

- BNI submitted CCN 048857, "Revised Response to U.S. Department of Energy Inspection Report IR-02-007," on January 13, 2003. Contained in this letter is a BNI commitment to conduct a 100 percent review of FCRs in engineering disciplines other than 1) electrical and 2) civil, structural, and architectural (which were 100 percent and 25 percent reviewed respectively) to ensure incorporation of FCR changes into design. Subsequently, BNI performed a review of the remaining 75 percent FCRs for civil, structural, and architectural discipline, one of which was 24590-WTP-FCR-C-02-046. FCR reviews were completed February 13, 2003. There were a total of 6 cases where FCRs were not appropriately incorporated.
- Drawing 24590-HLW-DD-S13T-00008 was revised and issued February 19, 2003, with 24590-WTP-FCR-C-02-046 incorporated.
- Project Archive and Document Control (PDC) revised the "Drawing & Sketch Check List" used by Discipline Specialists, to verify that any outstanding design change control documents and other approved design changes have been incorporated when a drawing is

revised or reissued for any reason. The Discipline Specialists involved with this process were given a verbal overview of how to perform the check. Hands on training is scheduled to be completed March 10, 2003, for those PDC personnel whose duties will require using the check list.

4) The corrective steps that will be taken to avoid further Findings

CCN 042775, Letter, R. F. Naventi, BNI, to R. J. Schepens, ORP, "Hanford Tank Waste Treatment and Immobilization Plant - Construction Authorization Readiness in Consideration of Recent Assessments and Inspections of Engineering," dated October 30, 2002, committed the Configuration Management (CM) Group to review and report on a sample of CM-enabling change control documents (CCD) every month for six months beginning November 2002. March and April 2003 reviews and reports are still to be completed. Completion of these reviews will verify that the revised "Drawing & Sketch Check List" has been properly implemented in incorporating all outstanding design changes into revised or reissued drawings.

In addition, the engineering monthly quality meetings for the month of March will include a discussion on the need to incorporate outstanding change documents into drawings.

5) The date when full compliance with the applicable requirements will be achieved.

FCRs identified in item 3 above, as not being appropriately incorporated in drawing revisions are being added to the current open CAR (03-010) to ensure that these FCRs are reflected properly in the next revision of the drawings. Drawings will be revised incorporating these FCRs by April 18, 2003.

The March monthly quality meeting will be held by March 31, 2003.

The Design Change Control Document Reviews and Reports will be completed and evaluated by Management by May 16, 2003.